

From: "Tony Lentych" <TLentych@msn.com> on 04/05/2004 06:21:08 PM
Subject: Regulation BB - Community Reinvestment Act

April 2, 2004

Docket No. 04-06
Communications Division
Public Information Room, Mailstop 1-5
Office of the Comptroller of the Currency
250 E St. SW,
Washington 20219

Docket No. R-1181
Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington DC 20551

Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th St NW
Washington DC 20429

Regulation Comments, Attention: No. 2004-04
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street NW
Washington DC 20552

Dear Officials of Federal Bank and Thrift Agencies:

The Community Economic Development Association of Michigan (a coalition of 240 members who work to rebuild neighborhoods and communities) stands with the National Community Reinvestment Coalition in opposition to the proposed changes to the Community Reinvestment Act (CRA) regulations. I am sure that by now you have received the detailed analysis from NCRC that supports this decision. We concur on all points.

It is my hope that you will realize that these proposed changes may halt the progress that we have made in many communities throughout Michigan and around the country. We could have not accomplished much of anything without the help of several financial institution partners. And to be perfectly clear, most of those financial institutions were, in fact, "motivated" to be involved in these communities through CRA. Any changes to these regulations should be weighed against the possible loss in community or external benefit in addition to any benefit (internal) claimed by those being regulated.

Thank you for your careful consideration on this matter – there has to be a better way to compromise.

Respectfully submitted,

Tony Lentych,

Executive Director

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